

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA ex rel.  
CORI RIGSBY AND KERRI RIGSBY**

**RELATORS/COUNTER-DEFENDANTS**

**VS**

**CIVIL ACTION NO. 1:06-cv-00433-LTS-RHW**

**STATE FARM MUTUAL INSURANCE  
COMPANY**

**DEFENDANT/COUNTER-PLAINTIFF**

**FORENSIC ANALYSIS ENGINEERING CORPORATION;  
EXPONENT, INC.: HAAG ENGINEERING CO.;  
JADE ENGINEERING; RIMKUS CONSULTING GROUP INC.,  
STRUCTURES GROUP; E.A. RENFROE, INC.,  
JANA RENFROE, GENE RENFROE;  
and ALEXIS KING**

**DEFENDANTS**

**JOINT MOTION FOR EXTENSION OF CERTAIN DISCOVERY AND  
SCHEDULING ORDER DEADLINES**

Relators and all remaining Defendants jointly move the Court for extension of certain discovery and Scheduling Order Guidelines as follows:

1. The deadlines for all parties to respond to outstanding Interrogatories and Requests for Production, from on or about December 28, 2009, to Monday, January 11, 2010;
2. The deadline for Relators to serve expert designations and reports, from January 15, 2010, to Friday, January 29, 2010;
3. The deadline for Defendants to serve expert designations and reports from February 16, 2010, to Tuesday, March 2, 2010.

The parties show that responding to the current written discovery will require substantial work beyond that normally expected and cannot reasonably be completed within the thirty (30) days provided by the rules, and that additional time is required due to the intervening holidays,

that extension of the expert designation deadlines is needed so experts will have time to review discovery responses, that no extension of the deadline to complete all discovery is sought, and that this Motion is filed not for the purpose of delay but that so adequate time may be had to comply with outstanding discovery requests.

WHEREFORE, the parties jointly pray that the Court will enter an Order extending the deadlines set forth above.

Respectfully Submitted,

CORI RIGSBY AND KERRI RIGSBY

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STATE FARM FIRE AND CASUALTY COMPANY

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By: *S/Kathryn Breard Platt*

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**CERTIFICATE OF SERVICE**

I the Robert C. Galloway, Butler, Snow, O'Mara, Stevens and Cannada, P.L.L.C, one of the attorneys for State Farm Fire and Casualty Company, hereby certify that on this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's Electronic Filing System:

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THIS, the 21<sup>st</sup> day of December, 2009

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